

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VIRTUOZZO (CYPRUS) LIMITED,

Plaintiff,

v.

CLOUD LINUX, INC. and
CLOUD LINUX SOFTWARE, INC.,

Defendants.

C. A. No. 21-512-LPS

VIRTUOZZO INTERNATIONAL GMBH,

Plaintiff,

v.

C. A. No. 21-513-LPS

CLOUD LINUX, INC. and
CLOUD LINUX SOFTWARE, INC.,
Defendants.

JOINT CLAIM CONSTRUCTION CHART

In accordance with Paragraph 12 of the Scheduling Order in these matters (D.I. 19 in 21-512; D.I. 19 in 21-513), as amended (D.I. 23 and 29 in 21-512; D.I. 23 and 29 in 21-513), Plaintiffs Virtuozzo (Cyprus) Limited and Virtuozzo International GmbH, and Defendants Cloud Linux, Inc. and Cloud Linux Software, Inc., respectfully submit this Joint Claim Construction Chart.

Attached as **Exhibit A** are tables setting forth certain agreed-upon constructions and identifying the parties' proposed claim construction positions with respect to certain disputed terms from the asserted claims of U.S. Patent Nos. 9,348,622 ("'622 Patent"), 7,461,148 ("'148 Patent"), 10,795,659 ("'659 Patent"), 8,145,740 ("'740 Patent"), and 8,539,137 ("'137 Patent") (collectively, the "Asserted Patents"), together with citations to the intrinsic evidence in support of each party's proposed constructions.

Copies of the Asserted Patents and those portions of the intrinsic record relied upon are also attached hereto as follows:

- **Exhibit B** — '622 Patent
- **Exhibit C** — '148 Patent
- **Exhibit D** — '659 Patent
- **Exhibit E** — '740 Patent
- **Exhibit F** — '137 Patent
- **Exhibit G** — Excerpts from the '622 patent file history
- **Exhibit H** — Excerpts from the '148 patent file history
- **Exhibit I** — Excerpts from the '659 patent file history
- **Exhibit J** — Excerpts from the '740 patent file history
- **Exhibit K** — Excerpts from the '137 patent file history

The parties have made a good faith effort to include herein all known support in the intrinsic record for their respective constructions, but reserve their right to amend their proposed constructions, to supplement this Joint Claim Construction Chart with additional intrinsic evidence, and/or to rely upon additional intrinsic evidence in their claim construction briefs. The parties further reserve the right to rely on extrinsic evidence to support a construction for a disputed term. The parties agree that the inclusion of a pin cite below when citing to particular evidence does not preclude reliance on any other part of that evidence. Each party also reserves its right to rely on any evidence relied upon by the other party to support its construction for a disputed term.

DATED: February 11, 2022

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